

**APDES INSPECTION REPORT**  
 Alaska Department of Environmental Conservation  
 Division of Water  
 555 Cordova St., Anchorage, AK 99501

ADEC APDES Inspection  
 Form Last updated (4/08)

Phone: (907) 269-7556  
 Fax: (907) 334-2415

## Section A: General Data

Inspection Date	Permit #	Borough	Receiving Waters	Weather	Facility Type
12/16/2008	AKR05A703	Kenai Peninsula	Resurrection Bay	Current Conditions: Clear skies, ~20°F, light winds Days since last precipitation >0.1 inches: 7 (12/09/2008)	Industrial

Discharges to: Surface Water ☒ Ground Water ☐

Announced Inspection (20 min. notice)

## Section B: Facility Data

<b>Name and Location of Site/ Facility Inspected</b>		<b>Entry Time</b>	<b>Permit Effective Date</b>												
Aurora Energy Services, LLC 903 Port Avenue Seward, AK 99644		14:00	09/25/2004												
<b>Loc:</b> Lat: Long: Source: not recorded		<b>Exit Time</b>	<b>Permit Expiration Date</b>												
		15:00	Administratively extended												
<b>On-Site Representative</b> Vic Stoltz, General Foreman		<b>Additional Participants:</b> Brent Andrews, ADEC Kara Kusche, ADEC													
<b>Responsible Official(s):</b>															
Vic Stoltz AES P.O. Box 1789 Seward, AK 99644 <input checked="" type="checkbox"/>	(intentionally left blank)  <input type="checkbox"/> Contacted?	<table border="1"> <thead> <tr> <th></th> <th>Yes</th> <th>No</th> </tr> </thead> <tbody> <tr> <td>Samples Taken?</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Analytical Results?</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </tbody> </table>			Yes	No	Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical Results?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Analytical Results?	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
Contacted? Yes.															
Phone: (907)224-3120 Fax: (907)224-3931		Phone: (###)###-#### Fax: (###)###-####													

## Section C: Findings/Comments

**BACKGROUND**

Aurora Energy Services (AES) is covered by the Environmental Protection Agency (EPA) General Multi-Sector General Permit for Stormwater Discharges (MSGP) under the National Pollutant Discharge Elimination System (NPDES) issued to Seward Terminal Inc. by administrative extension. Aurora Energy Services has also applied for an individual permit based on direction from Region 10 EPA. The Alaska Department of Environmental Conservation (ADEC) Division of Water has inspected this facility in the past on 3/27/08 and 7/27/06. Aurora Energy Services is responsible for managing the coal unloading of rail cars, stockpile storage, and loading of marine vessels. The purpose of this inspection is to respond to a concerned citizen complaint regarding coal dust release and settling that may potentially be affecting water quality. ADEC will look into the possibility of dust leaving the facility via wind and/or stormwater during this site visit.

**FIELD INSPECTION**

On December 16, 2008 13:50 ADEC Inspectors Kara Kusche and Brent Andrews drove the road outside the facility looking for evidence of fugitive coal dust which had left the facility property. We did not see evidence of this, surrounding snow was white in color and air was clear (see photos 2, 3, 4, and 5). At 14:00 we entered Aurora Energy Services and met with Vic Stoltz. We informed him that we were there to follow up on a concerned citizen complaint and showed Vic the photos dated January 29<sup>th</sup> and February 1<sup>st</sup> and 8<sup>th</sup> of 2008 (last winter). ADEC also received photos dated December 15<sup>th</sup>, 2008 (the day before our complaint investigation) but these conditions did not match what ADEC found during their site visit. Vic Stoltz was cooperative in answering ADEC's questions regarding their operations and best management practices regarding coal dust (see photo 1). He did acknowledge some dusty conditions during the time period of the photos last year and also discussed improvements that the facility has since made in response.

The facility has added additional spray bars and is in the process of expanding even more on the number of spray bars to dampen the coal and thus prevent dust. Aurora Energy Services has a standard operating procedure that states they will have a person monitoring for dust and are to turn on the sprayers if dust is detected. This is utilized in all 4 seasons. If excessive dust cannot be controlled despite control measures, the operation is to shut down until weather and/or control measures allow for dust-free operations. Vic stated that the facility employs one staff member to monitor the transfer of coal for dust. Vic also explained the facilities system of dealing with stormwater, including settling ponds (frozen on day of visit), culverts, outflow to Resurrection Bay, and directions of stormwater. We reminded Vic that the facility will need to submit and updated Stormwater Pollution Prevention Plan (SWPPP) in accordance with the new 2008 Multi-Sector General Permit for



Stormwater Discharges. He stated that the facility is aware of the new permit and has their Environmental staff person working on this.

#### SAMPLING ACTIVITIES

Not Applicable, no sampling activities performed for this visit.

#### RECORDS REVIEW

Site visit was in response to a citizen complaint of potential water quality impacts and therefore a detailed records review was not conducted. However, Vic Stoltz did show us weather/dust monitoring logs for dates noted in complainant photos and has monitoring reports for each loading/unloading event. These records are kept daily for operations. He offered to show Aurora Energy Service's responses to previous complaints but ADEC declined viewing.

#### SUMMARY

The site visit of AES was in response to a concerned citizen complaint and was investigated by two ADEC inspectors. Conditions noted in the complainant photos were not what ADEC observed on day of site visit. Photos showed dark snow and dusty areas of air, ADEC observed white snow and clear air on day of visit. Overall the facility appears to have made improvements in best management practices and has greatly reduced fugitive coal dust leaving the property. They have and will continue to make improvements to their sprayer system. They state that their Environmental staff person is working on their new SWPPP for the 2008 MSGP. This complaint is logged into ADEC's CATS database.

#### Section D: Compliance/Recommendations

#### ADMINISTRATIVE VIOLATIONS

None noted for this complaint follow-up site visit.

#### POTENTIAL WATER QUALITY VIOLATIONS

At the time of visit, the potential is still there for fugitive coal dust to leave the facility mainly through wind dispersion. This dust can affect air quality, and settle to become mixed with stormwater and area water bodies thus affecting water quality. For these reasons it is important that permit conditions be followed and best management practices be implemented and improved as necessary.

#### Section E: Appendices

None

Signature only acknowledges receipt of this report. Inspection report given to:

*Kara Kusche*

*12/23/08*

Kara Kusche, ADEC Inspector  
Division of Water/Water Quality Compliance

12/23/08

Company (if applicable):

Date



**PHOTO ADDENDUM – AURORA ENERGY SERVICES 12/16/2008**

PHOTO 1: FOREMAN EXPLAINING SPRAY BAR SYSTEM AND LOG OF KEPT RECORDS. LOCATION IS CONTROL AND MONITORING TOWER.



PHOTO 2: VIEW FROM MONITORING TOWER LOOKING OVER YARD AND COVERED CONVEYER BELT.



PHOTO 3: SNOW AND VEGETATION LOCATED ACROSS ROAD FROM FACILITY.

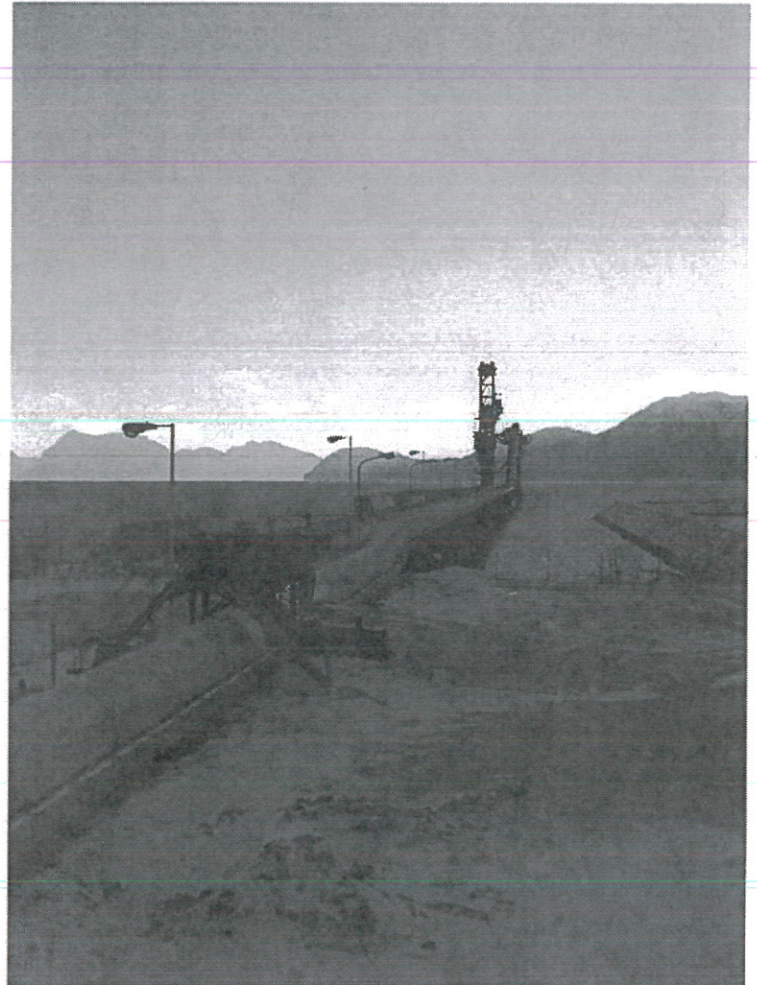


PHOTO 4: COVERED CONVEYER BELT LEADING TO TRANSFER LOCATION AT RESURRECTION BAY.



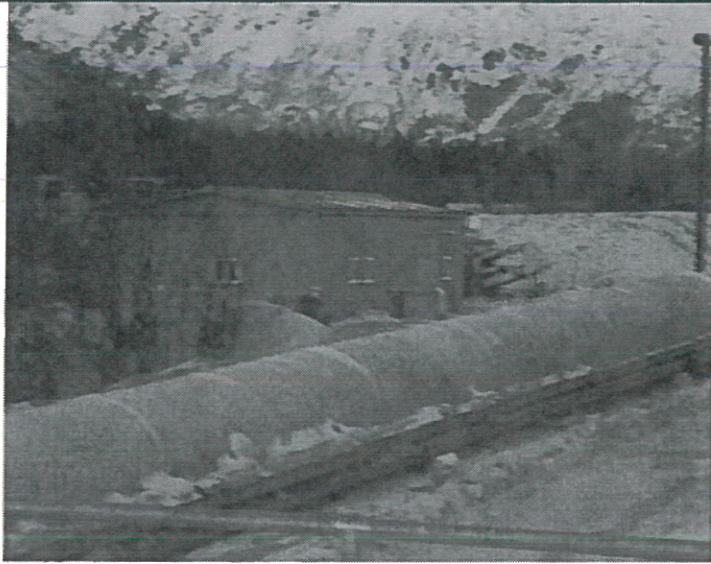


PHOTO 5: ANOTHER VIEW OF CONVEYER BELT AND AREA SNOW.